

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

KRISTINA MARTINEZ, and **TODD LOPEZ**,
as Co-Personal Representatives of the **ESTATE OF
DALE RAND ERICKSON**, deceased,
LUCILLE HIGGINS, **BRANDON ERICKSON**,
MATTHEW ERICKSON, **JONATHAN ERICKSON**,
and **MARLENE KANTOWSKI**, as parent and next
friend of **BRIANNA ERICKSON**,

Plaintiffs,

v.

Case No. 1:22-cv-00288-KK-SCY

**CORRHEALTH, PROFESSIONAL LIMITED
LIABILITY COMPANY d/b/a CORRHEALTH, LLC**,
a foreign limited liability company,
BRUCE BOYNTON, MD,
BARRY SCHOOLEY-STANFORD, MSN, FNP-C,
OAKLEY BLASDEL, RN,
KIMBERLY RICH-GAINEY, RN, and
MYRA MARTINEZ, LPN, in their individual capacities
as employees of CorrHealth, Professional Limited
Liability Company d/b/a CorrHealth, LLC,
**BOARD OF COUNTY COMMISSIONERS
OF SANDOVAL COUNTY**, and **GILBERT
ARMENDARIZ**, in his individual and official
capacity as Director of the Sandoval County
Detention Center,

Defendants.

SUPPLEMENT TO PETITION FOR REMOVAL
COMPLETE SET OF STATE COURT PROCEEDINGS PRIOR TO REMOVAL
PURSUANT TO RULE 81.1(A)

COME NOW, Defendants, **CORRHEALTH, PLLC d/b/a/ CORRHEALTH, LLC**,
BRUCE BOYNTON, MD, **BARRY SCHOOLEY-STANFORD, MSN, FNP-C**, **OAKLEY
BLASEL, RN**, **KIMBERLY RICH-GAINEY, RN**, and **MYRA MARTINEZ, LPN**, hereby
supplementing their previously filed April 19, 2022 Petition for Removal with a complete set of
State Court proceedings pursuant to New Mexico Local Rule 81.1(a). Attached hereto as **Exhibit**

A is a list of state court documents which accompany this filing, with the contemporaneous filing of said documents in their entirety.

Respectfully submitted this 10th day of May 2022,

SHARUZI LAW GROUP, LTD.

By: /s/ Jacqueline B. Sharuzi

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LPN.***

CERIFICATE OF SERVICE

I HEREBY CERTIFY that on the 10th day of May, 2022 was filed electronically through the CM/EFE electronic filing system, which caused the following attorneys to be electronically served as follows:

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